

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

JANE DOE,

Plaintiff,

v.

SEAN COMBS, DADDY’S HOUSE  
RECORDINGS INC., CE OPCO, LLC d/b/a  
COMBS GLOBAL f/k/a COMBS  
ENTERPRISES, LLC, BAD BOY  
ENTERTAINMENT HOLDINGS, INC., BAD  
BOY PRODUCTIONS HOLDINGS, INC., BAD  
BOY BOOKS HOLDINGS, INC., BAD BOY  
RECORDS LLC, BAD BOY ENTERTAINMENT  
LLC, BAD BOY PRODUCTIONS LLC,  
ORGANIZATIONAL DOES 1-10, INDIVIDUAL  
DOES 1-10, AND SHAWN CARTER,

Defendants.

Civil Action No. 1:24-cv-07975-AT

**DECLARATION OF ALEX SPIRO IN SUPPORT OF DEFENDANT SHAWN  
CARTER’S REPLY BRIEF IN FURTHER SUPPORT OF HIS MOTION  
FOR SANCTIONS PURSUANT TO FED. R. CIV. P. 11**

I, Alex Spiro, declare as follows:

1. I am a partner at Quinn Emanuel Urquhart & Sullivan LLP. If called as a witness, I could and would testify competently to the information contained herein.

2. I have been admitted to practice law in the State of New York since 2008. Until January 8, 2025, I had never filed a Rule 11 motion in any federal court or the equivalent in any state court, despite having litigated many hundreds of matters.

3. NYPD informed us that the denial of MTV’s permit for a Jumbotron was not only applicable to the immediate area outside Radio City Music Hall, but throughout New York City.

4. Attached hereto as **Exhibit 1** is a true and correct copy of a publicity poster for the 2000 VMAs, showing a start time of 8:00 pm eastern time. The image of this poster is available at <https://www.ebay.com/itm/225099430499>.

5. Attached hereto as **Exhibit 2** is a true and correct copy of a screenshot from the broadcast of the 2000 VMAs, showing that the ceremony ended at time stamp 190 minutes, 40 seconds. This video is available at: <https://www.youtube.com/watch?v=dDuZr4Ag2hk&t=11436s>. Given that the ceremony began at 8:00 p.m., this means the ceremony ended at 11:11 p.m.

6. Attached hereto as **Exhibit 3** is a true and correct copy of a screenshot from Google Maps showing the distance and typical driving time on a Thursday evening in September around 11:11 p.m. from Radio City Music Hall to the location of the Lotus Nightclub (409 W 14<sup>th</sup> St, New York, NY 10014).

7. Attached hereto as **Exhibit 4** is a true and correct copy of a screenshot from Google Maps showing the distance and typical driving time on a Thursday evening in September around 11:11 p.m. from Radio City Music Hall to the location of the Twirl Nightclub (208 23<sup>rd</sup> St., New York, NY 10011).

8. Attached hereto as **Exhibit 5** is a true and correct copy of a screenshot from Google Maps showing the distance and typical driving time on a Thursday evening in September around 11:30 p.m. from the location of Twirl Nightclub (208 23<sup>rd</sup> St., New York, NY 10011) to the location of the Lotus Nightclub (409 W 14<sup>th</sup> St, New York, NY 10014).

9. Attached hereto as **Exhibit 6** is a true and correct copy of the United States Naval Observatory's "Table of Sunrise/Sunset, Moonrise/Moonset, or Twilight Times" for the year 2000,

reflecting sunrise at 6:30 AM (adjusted for daylight savings) on September 8, 2000, posted on the United States Navy's website.

10. Attached hereto as **Exhibit 7** is a true and correct copy of a screenshot from Google Maps showing the distance and typical driving time on a Thursday evening in September around 11:00 pm – 12:00 AM from Radio City Music Hall to 40 Hedges Bank Drive, East Hampton, NY 11937.

11. Mr. Buzbee's declaration (Dkt. No. 76) makes several allegations concerning an attorney named Marcy Croft. He further claims that Ms. Croft and I have "worked alongside each other for years." I have never met Marcy Croft. Several years ago, I worked with Ms. Croft on one pro bono case in which I advocated for the closure of three Mississippi prisons for maintaining harsh conditions that violated inmate's constitutional rights. As a result of the work on this matter, on February 28, 2024, the Justice Department issued its findings that these conditions violated the 8<sup>th</sup> and 14<sup>th</sup> Amendments of the U.S. Constitution, leading to the closure of these facilities. I was one of five attorneys involved in that case and at best, spoke on a conference call with many of them. I have not spoken to her since that matter. I know nothing about her purported involvement in any of the misconduct alleged in Mr. Buzbee's declaration, other than that Mr. Buzbee asserts such allegations.

I declare under the penalty of perjury that the foregoing statements are true and correct.  
Executed in New York, New York on the 29th day of January 2025.

/s/ Alex Spiro

Alex Spiro